

## REMARKS

Claims 1-8, 11 and 12 were pending and presented for examination in this application. In an Office Action dated August 10, 2006, claims 1-8, 11 and 12 were rejected. With this Amendment, Applicant is canceling claims 1-7 and 12, amending claims 8 and 11, and adding new claims 16-28. These changes are believed not to introduce new matter, and their entry is respectfully requested. On the basis of the following remarks, Applicant respectfully requests that Examiner reconsider all outstanding rejections, and withdraw them.

Examiner rejected claims 1-8, 11 and 12 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,685,286 ("Chen") in view of various other references and combinations thereof. Applicant respectfully submits that the pending claims, as amended, are patentable over the cited references, alone or in combination.

Independent claim 8 recites a method for installing a plurality of computer drives within a computer chassis. Specifically, the claim recites securing a first computer drive to a mounting structure, and placing the mounting structure and the first computer drive through an opening in a top side of the computer chassis. A second computer drive is secured to the mounting structure, and the mounting structure is secured to the computer chassis. Using the claimed method to install computer drives, often the most frequently replaced and accessed components within a computer system, has several advantages. Attaching a drive to a mounting structure from outside the confines of the computer chassis requires less space than installing the drive directly to the chassis. Placing the mounting structure in the chassis through an opening in the top of the chassis is also less cumbersome than the conventional method of removing an entire chassis side, which may be structurally supportive, to achieve access. Once the drives have been

installed, according to the claimed method, subsequent access to them can be simply achieved, for example, through the same opening in the top of the chassis (as recited in claim 28).

None of the cited references teach the method of claim 8. More specifically, none of the references disclose or suggest “securing a first computer drive to a mounting structure” and “placing the mounting structure and first computer drive in [a] computer chassis through an opening in a top side of the computer chassis,” as claimed.

Chen, for example, discloses a computer enclosure that includes a small drive bracket (30) that can be used to store data storage devices. As an initial matter, Chen is entirely devoid of any mention of how drives are installed. Each of the figures in Chen depict empty drive brackets (30) installed within a computer chassis. This suggests that any drives will be installed on the bracket 30 *after* the bracket 30 is installed in a computer, rather than secured to a mounting structure and placed together with the mounting structure into a chassis as claimed. Thus, to the extent that Chen includes any teaching of how drives are installed, it is away from, rather than towards, the claimed invention.

Chen also fails to teach the element of “placing the mounting structure and first computer drive in [a] computer chassis through an opening in a top side of the computer chassis.” The only teaching regarding how the drive bracket (30) of Chen is loaded into the computer chassis is the statement that “[t]he combined small drive bracket 30 and horizontal plate 60 is then attached to the cage 10 below the vertical plate 122.” (3:3-5) However, because Chen’s small drive bracket (30) must be installed below a large drive bracket (70) (see FIGS. 1-3), it is unlikely that a user would place the small bracket (30) through the top of the chassis, as this would require the user to reach deep into the chassis and navigate beneath the large drive bracket (70) in order to

secure the small drive bracket (30) thereto. A more intuitive method would be to install the bracket (30) from the side, an approach inconsistent with the claimed invention.

The other references fail to teach the claimed elements. While Gebara, for example, discloses the insertion of a drive 219 into a cage 246 (6:16-19) to fit inside the frame, the cage 246 is shown and described as fitting through an opening 245 on the front of the computer, not “through an opening in a top side of the computer chassis” as per the claimed invention. The other references, cited for other limitations, do not overcome these defects.

For all of the above reasons, Applicant respectfully submits that independent claim 8 and the remaining claims which depend on it, are patentably distinct over the cited references. In addition, the references fail to disclose other elements claimed in dependent form. These include securing a computer component, in addition to the first and second drives, to the mounting structure (claim 24), including wherein the component is a card reader (claim 25). Nor do the references teach securing a second drive on top of the mounting structure as per claim 19.

On the basis of the above amendments, consideration of this application and the early allowance of all pending claims are requested. If the Examiner believes that direct contact with the Applicants’ attorney will advance the prosecution of this case, the Examiner is encouraged to contact Applicants’ representative as indicated below.

//

//

//

//

//

Respectfully submitted,  
YI-LUNG KUO

Dated: November 13, 2006

By: /Colleen Chien/  
Colleen V. Chien, Reg. No. 55,062  
Attorney for Applicants  
Fenwick & West LLP  
Silicon Valley Center  
801 California Street  
Mountain View, CA 94041  
Tel.: (415) 875-2319  
Fax: (415) 281-1350  
Email: cchien@fenwick.com